## **Air Resources Board**



1001 I Street • P.O. Box 2815 Sacramento, California 95812 • www.arb.ca.gov



May 5, 2005 # 05-01

Mr. Paul C. Bauer Technical Services Manager Healy Systems, Inc. 18 Hampshire Drive Hudson, New Hampshire 03051

Dear Mr. Bauer:

Thank you for your letters, dated April 18, 2005, requesting the following amendments to Executive Order G-70-191-AA (Healy ORVR Phase II Vapor Recovery System):

- 1. Use of the Model 900 EVR nozzle as a certified replacement component to the Model 800 ORVR nozzle; and
- 2. Addition of the Lazy-J and Curly-Q dispenser hose configurations.

The Model 900 EVR nozzle and Lazy-J and Curly-Q configurations are components of the Healy Phase II Enhanced Vapor Recovery (EVR) system that is currently certified under Executive Order VR-201-A, signed on April 8, 2005.

This letter approves the Healy Model 900 EVR nozzle and the Lazy-J and Curly-Q dispenser hose configurations for use on the Healy ORVR Phase II Vapor Recovery System (Executive Order G-70-191-AA). The justification and conditions approving each request are summarized as follows:

## 1. Model 900 EVR Nozzle Replacement

Section 19.1 of the Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities (CP-201) addresses replacement components on vapor recovery systems with a terminated certification. Pre-EVR and ORVR Phase II systems are terminated due to EVR standards and specifications that took effect on January 1, 2005. The operative date of these new standards and specifications is April 1, 2005. Section 19.1.4 specifically states that:

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <a href="http://www.arb.ca.gov">http://www.arb.ca.gov</a>.

California Environmental Protection Agency

Mr. Paul C. Bauer May 5, 2005 Page 2

When a certified, compatible component or replacement part that meets the operative standards or specifications becomes commercially available, only that component or part shall be installed. This shall not require the replacement of already-installed equipment prior to the end of the useful life of that part or component. Components or parts installed at the time the system reaches the end of the allowable in-use period for the system, may no longer be used even if the end of their useful life has not been reached.

The Model 900 EVR nozzle has met the operative standards and specifications as certified on the Healy Phase II EVR system (Executive Order VR-201-A). ARB staff has determined that the Model 900 EVR nozzle is compatible with the Healy ORVR Phase II Vapor Recovery System (Executive Order G-70-191-AA). Healy has also indicated to the satisfaction of ARB staff that the Model 900 nozzles are commercially available as replacements for the Model 800 ORVR nozzles.

Therefore, the Healy Model 900 EVR nozzle shown in Figure 1 is approved as the only nozzle that can be used for new installations and as a replacement nozzle for the Healy ORVR Phase II Vapor Recovery System (Executive Order G-70-191-AA).

Any Model 900 EVR nozzle installed on a GDF permitted under Executive Order G-70-191-AA shall be subject to all the same testing requirements applicable to the Model 800 ORVR nozzle, as listed in Exhibit 2 of G-70-191-AA and those sections of the Vapor Recovery Equipment Defects (VRED) list applicable to Executive Order G-70-191-AA. The April 12, 1996 version of TP-201.5 (A/L Testing) shall be used regardless of the model of nozzle installed on a Gasoline Dispensing Facility (GDF) permitted under Executive Order G-70-191-AA.

## 2. Addition of the Lazy-J and Curly-Q Configurations

The Lazy-J and Curly-Q configurations are certified coaxial hose configurations on Healy's Phase II EVR System (Executive Order VR-201-A). The coaxial hoses, used in the Lazy-J and Curly-Q configurations, have demonstrated compatibility with the VP1000 vacuum (vane) pump during the extensive testing that was conducted in the certification of the Healy Phase II EVR System under Executive Order VR-201-A. These tests included vapor to liquid volume ratio (V/L), liquid blockage and ORVR compatibility. The VP1000 vacuum pump is the same pump that is specified in Executive Order G-70-191-AA and Executive Order VR-201-A.

Mr. Paul C. Bauer May 5, 2005 Page 3

Therefore, the Lazy-J and Curly-Q dispenser hose configurations shown in Figures 2 and 3 are approved for use on the Healy ORVR Phase II Vapor Recovery System (Executive Order G-70-191-AA).

Lastly, the components listed in Executive Order G-70-191-AA and all approval letters pertaining to it, through the provisions provided in Section 19.1.4 of CP-201, may remain in use for the remainder of its useful life or the allowable in-use period.

If you have questions or need further information regarding this approval, please contact Paul Marzilli at (916) 445-7431 or via email at <a href="mailto:pmarzill@arb.ca.gov">pmarzill@arb.ca.gov</a> or Pat Bennett at (916) 322-8959 or via email at <a href="mailto:pbennett@arb.ca.gov">pbennett@arb.ca.gov</a>.

Sincerely,

William V. Loscutoff, Chief

Monitoring and Laboratory Division

cc: Sam Otkay

Mojave Desert AQMD

Brian Aunger

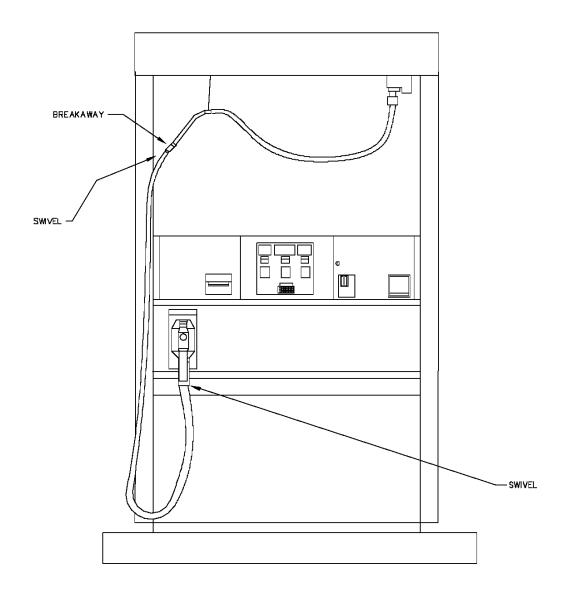
San Luis Obispo County APCD

Tania Leisten

Monterey Bay Unified APCD

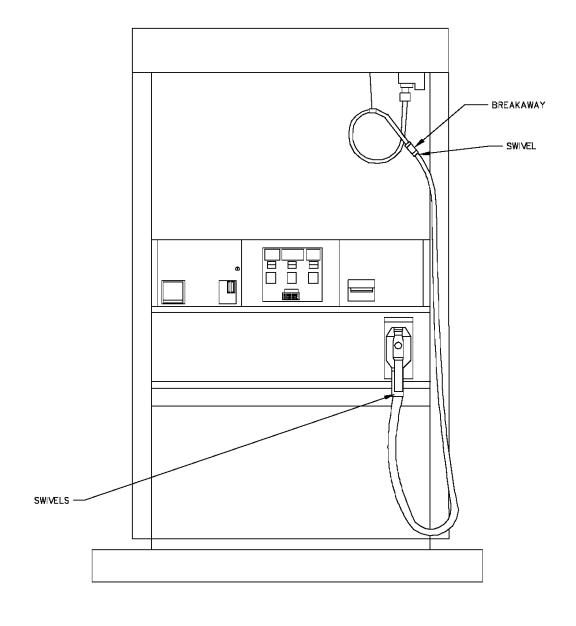
Figure 1 Model 900 EVR Nozzle VAPOR COLLECTION NOZZLE SERIAL NUMBER LOCATION (LAY NOZZLE ON SIDE TO SEE INFO)

Figure 2 Lazy-J Hose Configuration<sup>1</sup>



<sup>&</sup>lt;sup>1</sup> If swivel breakaway is used (ARB Approval Letter # 03-03), breakaway will be at base of nozzle.

Figure 3
Curly-Q Hose Configuration<sup>2</sup>



 $^{2}$  If swivel breakaway is used (ARB Approval Letter # 03-03), breakaway will be at base of nozzle.